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February 4, 2019

VIA ECF

U.S. District Judge Paul A. Engelmayer
United State District Court
Southern District of New York
40 Foley Square, Courtroom 618
New York, New York 10007

Re: *Doncouse v. PQ New York, Inc. d/b/a Le Pain Quotidien & Heroic Multiplier LLC*, 1:18-cv-05539-PAE-KNF

Dear Judge Engelmayer:

This firm represents Defendant Heroic Multiplier LLC (hereinafter Defendant) in the referenced case. We were retained today after our client's principal returned from traveling and found a copy of the summons and amended complaint in her mail. I write pursuant to Rule 2(A) and (E) of Your Honor's Individual Rules of Practice to request a 30-day extension from today for Defendant to answer, move, or otherwise respond to the amended complaint. The answer was originally due January 14, 2019 after service of the summons and amended complaint upon the New York State Secretary of State. This is Defendant's first request for an extension. Defendant requests this extension to have time to review and investigate the allegations in the amended complaint and determine an appropriate response.

Defendant waives any personal service defenses. Plaintiff's counsel has consented to Defendant's request notwithstanding Defendant's default.

Defendant does not believe that the requested extension will affect any other scheduled dates in the case.

Thank you for your consideration of this request.

Yours truly,

A handwritten signature in dark ink, appearing to read "Andrew Weltchek". The signature is fluid and cursive, with the first name "Andrew" written in a larger, more prominent script than the last name "Weltchek".

Andrew Weltchek

cc: Hon. Paul A. Engelmayer (via email:
EngelmayerNYSDChambers@nysd.uscourts.gov)
Alicia McBride, Esq. (via ECF)
Jennifer Courtian, Esq. (via ECF)